

EXHIBIT E

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

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4 SYNGENTA CROP PROTECTION, LLC

5 Plaintiff

6 vs.

CIVIL ACTION NO:

7 WILLOWOOD, LLC, et al.

1:15-CV-274

8 Defendants

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12 The Videotaped deposition of WU XIAOLONG,
13 as translated by Sze Wang So, Interpreter, was held on
14 Wednesday, August 31, 2016, commencing at 9:34 a.m.,
15 at the offices of Goodwin Procter, Suite 2801, One
16 Exchange Square, 8 Connaught Place, Central, Hong Kong,
17 before Jenny Buck, Accredited Real-time Reporter.

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25 REPORTED BY: Jenny Buck

<p>*</p> <p>Page 34</p>	<p>*</p> <p>Page 36</p>
<p>Page 35</p>	<p>Page 37</p> <p>12 Q. Have you ever heard of DABCO?</p> <p>13 A. Yes, I did.</p> <p>14 Q. When did you first hear of DABCO?</p> <p>15 A. April or May last year, April or May 2015.</p> <p>16 Q. How did you hear about it?</p> <p>17 A. It was Mr. Shen who came to me and asked me</p> <p>18 about DABCO.</p> <p>19 Q. Mr. Shen of Willowood Limited?</p> <p>20 A. Yes.</p> <p>21 Q. What did he say?</p> <p>22 MR. SANTHANAM: Objection. Hearsay.</p> <p>23 A. He asked us whether we used DABCO in our</p> <p>24 production.</p> <p>25 BY MR. NEUMAN:</p>

<p>* CONFIDENTIAL -- ATTORNEYS' EYES ONLY *</p> <p>Page 38</p> <p>1 Q. And in response to that inquiry, what did 2 you do? 3 MR. SANTHANAM: I'll make a standing 4 objection to hearsay on this line of questioning. 5 A. I told him we didn't use it. 6 BY MR. NEUMAN: 7 Q. How did you know that? 8 A. Because I participated in the raw material 9 purchase. I had never heard of it before. And then 10 I asked the factory whether they used it in the 11 production and the answer was no. 12 Q. Did you communicate that to Mr. Shen? 13 A. Yes, I did.</p>	<p>* CONFIDENTIAL -- ATTORNEYS' EYES ONLY *</p> <p>Page 40</p> <p>1 Q. What did they say to you about DABCO? 2 A. They asked me again whether we used DABCO. 3 I told him we don't use it. 4 Q. And did they then ask you anything further? 5 A. They hoped that I could ask all the 6 intermediate suppliers whether they used DABCO or not. 7 Q. Did they say why they were concerned about 8 this? 9 A. They said that a certain company holds the 10 patent of this catalyst. 11 Q. Anything else? 12 A. Nothing else. They just said that there's 13 another company which holds the patent for this 14 catalyst and said that our azoxystrobin contains such 15 catalyst. 16 Q. And were they concerned about that? 17 A. Yes. 18 Q. So what did you do in response to that 19 discussion, if anything? 20 A. When I came back to my company, I asked the 21 suppliers, including suppliers of intermediates, 22 whether they used the DABCO or not. 23 Q. Which suppliers did you ask, if you recall? 24 A. Almost all suppliers of intermediates. 25 Q. And what did they tell you?</p>
<p>Page 39</p>	<p>* CONFIDENTIAL -- ATTORNEYS' EYES ONLY *</p> <p>Page 41</p> <p>1 A. They said that they didn't use it; they had 2 never heard of it.</p> <p>?</p>